

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ROSHANDA FOSTER,

Plaintiff,

V.

LEGACY KEYS, LLC; 1250 NORTH:
INVESTMENTS LLC; WATKINS .
REALTY SERVICES, LLC; :
INVESTORS MANAGEMENT :
GROUP, INC.; OAK COAST :
PROPERTIES, LLC; LETITIA :
GREENWAY and JOHN DOES #1-5 :

Defendants.

CIVIL ACTION

FILE NO.: 1:17-cv-01690-WSD

MOTION TO REMAND

COMES NOW Roshanda Foster, and pursuant to 28 U.S.C. § 1447, moves for an order remanding this case back to Fulton County State Court for two independent reasons.

First, Defendant Letitia Greenway has been added to Plaintiff's Complaint – 1st Amended as a party Defendant, and as a result, there is no longer complete diversity of citizenship amongst the parties. ***Second***, Defendants' joint Notice of Removal is facially insufficient in that it fails to properly allege the citizenship of

each Defendant.

Plaintiff, therefore, respectfully requests that this Court remand this matter back to Fulton County State Court. A brief memorandum of law is attached as **Exhibit 1**.

This 1st day of June, 2017.

THE STODDARD FIRM

/s/ **Keith N. Evra**

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CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing document has been prepared with one of the following font and point selections approved by the Court in L.R. 5.1.

Specifically, the pleading was prepared using Times New Roman font, point 14.

/s/ Keith N. Evra

Keith N. Evra

Georgia Bar No. 810271

CERTIFICATE OF SERVICE

I certify that I have served a true and correct copy of the foregoing upon all counsel of record using the CM/ECF system, which will automatically send email notification of such filing to the following attorney of record:

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This 1st day of June, 2017.

/s/ Keith N. Evra

Keith N. Evra

Georgia Bar No. 810271